

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

BRANDY CIAPANNO,
v.
COMCAST CORPORATION and
STELLAR RECOVERY INC.,
Defendants.

Plaintiff,

Case No.

NOTICE OF REMOVAL OF STATE
COURT ACTION TO FEDERAL COURT

Removed from Clark County Washington
Superior Court [Action Served but not
filed].

PLEASE TAKE NOTICE that defendants STELLAR RECOVERY, INC. (“SRI”) and COMCAST CORPORATION (“COMCAST”) hereby remove the state court action described below to this court.

1. This is a civil action over which the court has original jurisdiction under 28 U.S.C. § 1331 and 15 U.S.C. 1692k and which may be removed to this court under 28 U.S.C. §1441(a), because it involves a claim under the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 *et seq* (“FDCPA”).

NOTICE OF REMOVAL TO FEDERAL
COURT- 1

SIMBURG, KETTER,
SHEPPARD & PURDY, LLP
999 THIRD AVENUE, SUITE 2525
SEATTLE, WASHINGTON 98104-4089
(206) 382-2600 FAX: (206) 223-3929

2. Plaintiff served the summons and complaint on Defendant SRI on February 2, 2017. Through the date of this removal, plaintiff has not filed the action in Superior Court of Washington for Clark County. Exhibit 1 to this notice is a copy of the summons and complaint.

3. This Notice of Removal is timely because defendant was served on February 2, 2017.

4. Venue is proper in this district because it is the district embracing the place where the action is pending. *See* 28 U.S.C. §1441(a) and where the plaintiff resides.

5. No proceedings have occurred in the state court action.

6. In filing this notice, Defendants do not waive any defenses or claims including (but not limited to) any defenses based on jurisdiction, service or statute of limitations.

Dated this 14th day of February 2017.

SIMBURG, KETTER, SHEPPARD &
PURDY, LLP

s/ Andrew D. Shafer
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**NOTICE OF REMOVAL TO FEDERAL
COURT- 2**

SIMBURG, KETTER,
SHEPPARD & PURDY, LLP

1 CERTIFICATE OF SERVICE

2 I hereby certify that on the date below I electronically filed the foregoing Notice of
3 Removal with the Clerk of the Court using the CM/ECF system which will send notification
of such filing to the following:

4 None.

5 And I hereby certify that I have e-mailed and mailed by United States Postal Service
6 the document to the following non CM/ECF participants:

7 Jonathan Baner
8 724 S Yakima Ave.; Suite 100
9 Tacoma, WA 98405-4864
10 253-212-0353
11 Attorney for Plaintiff

12 DATED: February 14, 2017.

13 SIMBURG, KETTER, SHEPPARD
14 & PURDY, LLP

15 s/ Amber Harris
16 Legal Assistant